

1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
tel. 202.434.4100
fax 202.434.4646

Writer's Direct Access
C. Douglas Jarrett
(202) 434-4180
Jarrett@khlaw.com

Via ECFS

November 3, 2015

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: *Ex Parte* Presentation, WC Docket No. 10-90, National Rural Electric
Cooperative Association**

Dear Ms. Dortch:

The National Rural Electric Cooperative Association (NRECA) provides this written *ex parte* presentation in the referenced proceeding under Section 1.1206 of the Commission's rules. This submission follows up on the NRECA and UTC *ex parte* submission of October 5, 2015,¹ in which the Associations provided the annual reporting documents that rural electric cooperatives file with three financial institutions at least one of which many rural cooperatives secure loans to support of capital projects and operations: the USDA's Rural Utility Service (RUS), National Rural Utilities Cooperative Finance Corporation (CFC) and CoBank.

These annual reporting forms describe the extent of the distribution or transmission networks operated by rural electric cooperatives. The Associations explained that the substantial outside electric plant and the distribution and transmission networks operated by rural electric cooperatives reasonably establish the "technical qualifications" of electric cooperatives to participate in the CAF II reverse auction.

This letter provides the following points of clarification:

1. These financial institutions require electric cooperatives to submit the annual reports no later than March 31, reflecting financial and operational data for the end of the prior calendar year.

¹ Letter from Douglas Jarrett, on behalf of National Rural Electric Cooperative Association and Utilities Telecom Council, to Marlene Dortch, FCC Secretary, WC Docket No. 10-90 (filed October 5, 2015) (Associations' Letter).

KELLER AND HECKMAN LLP

Marlene Dortch, Secretary

November 3, 2015

Page 2

2. These reporting forms require data on outside plant and distribution and transmission networks for the most recent and the prior calendar years.²
3. Many rural electric cooperatives have outstanding loans and credit lines with one of these three financial institutions.
4. As in the Associations' Letter, NRECA proposes that a prospective CAF II bidder (that is an electric cooperative) submit redacted portions of these reports, disclosing the information that sets out the extent of a cooperative's transmission or distribution network. In addition to the redacted portion of the reporting form, the rural electric cooperative could certify that the submission is a true and accurate copy of the annual reporting form provided to its financial institution.³

Should the Commission have any questions regarding this matter, please contact the undersigned, preferably by telephone.

Respectfully submitted,



C. Douglas Jarrett

cc: Alex Minard
Heidi Lankau

² The CFC Form 12 is filed by generation and transmission ("G&T") cooperatives. Section B, Facilities in Service, p. 26 of 41, discloses transmission and distribution lines in service at the end of the reporting year. NRECA proposes that a copy of the redacted version of the prior year's report be submitted to provide two years' data if the Commission believes it is necessary.

³ This certification could also include a certification to the number of years the electric cooperative has operated its distribution and/or transmission network.